

After a quick review of the proposed rule, I question the effectiveness and implementation. As a current flight instructor not associated with a large flight school, this seems extremely burdensome to comply with. It is not clear to me the author had much insight into the existing flight training environment. Instead of forcing upon the individual instructors the requirement to screen and document each student why not utilize the existing means to document student pilots. Rather than make this a separate submission of personal data, this rule could more effectively be implemented as part of the issuance of a student pilot certificate. That is already a well documented procedure and would be a solid means for the government to maintain control. The only change might be that in some cases issuance might not be immediate while the applicant is vetted. It might also be best to decouple the student certificate with the medical form, thus requiring the applicant to visit a FSDO or DPE. Operationally, a student pilot does not need the actual certificate until solo; this rule might dictate delaying the training until a certificate is issued. That way the individual instructor can ask for a producible document to verify the student pilot is indeed authorized to receive training.

My approach would work well for the <12,500# issue. Advanced training in heavier aircraft as well as the addition of ratings and recurrent training is a slightly different issue. It too however can be adequately addressed using existing FAA documentation. My understanding is the training would be conducted based upon the issuance of a US pilot's certificate. This issuance should serve as the necessary screening device for these pilots.

Addressing the requirement for recurring security training. Flight instructors are required to renew their instructor privileges every two years. It would be more effective and easier to document this training if it was made part of the initial flight instructor training and a mandatory requirement for refresher training.

In summary the need to ensure the wrong people do not receive flight training is necessary. However the method outlined in this docket is cumbersome and I question its effectiveness operationally. I would venture to guess the vast majority of licensed flight instructors are small operations which will be severely hurt by the constraints levied by this proposal. More importantly all the procedures and data needed to achieve the intent of this proposal are already available if the TSA and the FAA would coordinate and work together.